

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

HEARING DATE: 11/03/2011
HEARING TIME: 9:30 a.m.
HEARING PLACE: Binghamton, NY

In Re:

Case No. 11-60171

GILBERT X. CRAMATTE,

SSN: xxx-xx-5356

(Chapter 7)

Debtor.

**TRUSTEE'S MOTION FOR SALE OF PROPERTY
PURSUANT TO 11 U.S.C. §363 and BANKRUPTCY RULE 6004**

L. DAVID ZUBE, affirming the following under penalty of perjury, states:

1. On 02/04/2011, the above-named debtor(s) did file a petition in the Bankruptcy Court for the Northern District of New York seeking relief under Chapter 7 of the Bankruptcy Code.

2. Your deponent is the duly qualified and acting trustee of the estate of the above-named debtor in such Chapter 7 proceeding.

3. The trustee has now received an offer to purchase the following property of the debtor's estate: 2005 Dodge Dakota pick up truck (VIN 1D7HW48K155155561). The sale shall be under the following terms: the Trustee has received an offer from the Debtor to purchase the estate's equity in the subject property for the net amount of \$1,500, being the value of the vehicle (\$5,500.00) minus the debtor's allowed exemption (\$4,000.00).

4. Your deponent believes that it would be in the best interest of the bankruptcy estate to accept the offer for the following reasons: a) the Debtor's offer is reasonable in light of the value of the vehicle; b) the Debtor's offer obviates the need for the Trustee to take possession of the vehicle and proceed to sell it by other means, then first paying the Debtor the value of the allowed exemption.

WHEREFORE, it is respectfully requested that, unless a more favorable offer to purchase is made on or before the return date of the trustee's motion for sale, the Court grant the application to sell the subject property pursuant to Section 363 of the Bankruptcy Code.

Subscribed under penalty of perjury on 10/11/11.

/s/ L. David Zube

L. David Zube, Chapter 7 Trustee